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Prepped by Ollie Stewart

Document Number:

13) IV-E-8

Docket Number:

A-91-46

A-91-46 IV-E-8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

12-31-91

OFFICE OF AIR AND RADIATION

## MEMORANDUM

SUBJECT: Conversation with David Kulp of Ford Motor Co.

FROM:

Mary T//Smith, Di

Field Operations and Support Division

TO:

Public Docket No. 91-46

On December 19, 1991, I spoke with David Kulp of Ford Motor Co. regarding mileage accumulation on the test vehicles participating in Ford's MMT program. Mr. Kulp indicated that the vehicles were driven 17 hours per day during two shifts. He said this is permitted in EPA's certification regulations and that normally certification cars will be run for two to three shifts. He also stated that he does not believe running the cars for 17 hours per day will have any effect on the cars since they will become stabilized once they have initially warmed-up.